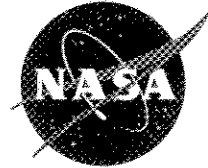


National Aeronautics and Space Administration
Headquarters
Washington, DC 20546-0001



September 18, 2009

Reply to Attn of: General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance by NASA Employees at a Reception to Celebrate the Success of STS-127 on September 23, 2009

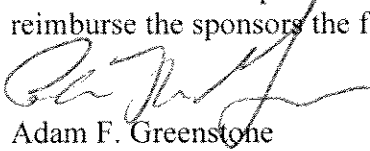
On September 23, 2009, co-sponsors, Lockheed Martin, Honeywell, Boeing and United Space Alliance will host a reception at the Russell Room 253, in Washington, DC, from 6:00p.m-8:00p.m.

This event will be a widely-attended gathering of approximately 600 representatives of NASA, the aerospace industry, Congress and their staffers, trade associations, academia, and media. The cost of the reception will be approximately \$40.00 per person. I find that the reception meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g)(2). I have determined that free attendance at the above mentioned reception is in the interest of the agency because it will further agency programs and operations. The event will provide NASA employees with the opportunity to discuss the STS-127 space mission and other NASA programs with representation of the communities participating in the reception.

Accordingly, NASA employees that have been invited to attend may accept free attendance at the event. They may also accept invitations for accompanying spouses or guests. However, NASA employees whose duties may substantially affect the event sponsors, such as by way of procurement duties, should seek an individual determination pursuant to 5 C.F.R. § 2635.204(g)(3)(i), regarding participation in this event from their local ethics counselor.

Moreover, NASA employees who are in non-career positions in which the President's Executive Order of January 21, 2009, requires signing an ethics pledge may only attend if they reimburse the sponsors the cost of the refreshments they consume at the reception.

Attendees are reminded of the \$20 gift exception at 5 C.F.R. § 2635.204(a) which provides that employees may accept gifts valued at no more than \$20 per occasion. NASA invitees should not accept any gift items distributed at the reception which exceed these caps. NASA invitees who are required to sign the ethics pledge may only receive such gifts if they reimburse the sponsors the fair market value.

A handwritten signature in black ink, appearing to read 'Adam F. Greenstone', is written over the printed name below it.

Adam F. Greenstone